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To: Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
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From: Lynn Clarkson, Managing Director, Clarkson Soy Products, LLC

Re: Docket TM-0407

Date: August 15, 2005

Request: Unbleached conventional lecithin should be removed from the National List because unbleached organic lecithin has become available in substantial commercial quantities and excellent quality within the past three years.

Availability: Organic lecithin is available in standardized fluid formulations with functional properties identical to those of conventionally produced lecithin. Lecithin is typically used as an emulsifier in foods at concentrations well under 1%. At normal concentrations, our company can currently supply enough 100% organic lecithin for 120,000,000 pounds of food. We can rapidly double than capacity to meet demand as needed. Is that sufficient to meet all the need for lecithin in a market of unknown demand? I don't know. Nor do I know what other companies are making available. If the standard for commercial availability is to meet all the need in a market, there will be almost no new organic ingredients. If the standard is "substantially available", then the market will adjust through production and price to meet the markets' needs. That support and flexibility will permit availability of organic materials to flourish.

Price: Critics of organic foods often argue that the price is too high. Fortunately, no one is compelling organic consumers to buy at premium prices. Since organic soybeans currently cost 2.5 times as much as conventional soybeans, organic soy ingredients will cost at least 2.5 times comparable conventional ingredients. Since the organic extraction process is not as "efficient" as the conventional solvent extraction process, the organic process itself costs more. Since organic production runs are rarely as large as conventional runs, unit production costs are typically higher than conventional. However, lecithin is normally used in foods as a micro-ingredient at concentrations less than 1%. At that level, the cost of the lecithin is almost irrelevant to the price of the product. Labeling alone often costs more that the added cost of using 100% organic lecithin. Packaging and delivery costs dwarf the added costs of organic lecithin. Fundamentally, organic lecithin, once available, should be used to keep faith with the consumer. Conventional lecithin should no longer be permitted as an exception.

Experience: Those dedicated to using 100% organic ingredients as they become available have enjoyed organic lecithin for over two years. Under the NOP, many processors have ignored the availability and continued to use conventional lecithin for reasons of price; many certifiers have ignored the requirement that conventional use stop when organic supply becomes commercially available. From an initial food processor in Asia who purchased organic lecithin as a necessary ingredient in the world's first 100% organic baby food, usage has gradually grown. It now includes a variety of food products including tortillas, baked goods, chocolates, breakfast bars and tofu.

Non-GMO substitutes: A number of suppliers offer organic processors lecithin made from conventional Identity Preserved non-GMO soybeans. This is conventional lecithin and should be removed from foods labeled "organic" once comparable quality organic lecithin is available. While such conventional product might be lower in cost or more convenient, it fails to support the development of the organic market and fails to provide the organic consumer the organic ingredients that she/he seeks. Continuing to permit its use and to list it under Section 205.606 discourages the greater development of the organic market and marginalizes the growth of the organic community.

Limitation: Lecithin does not come in just one formulation. One of the major international lecithin suppliers produces 165 standardized versions of conventional lecithin. For the moment, the organic world certifies only two or three standardized formulations. Fluidized organic lecithin is readily available now. Dry granular organic lecithin is probably a year from introduction. Standard specifications for organic and conventional lecithin are identical. With respect to fluidized lecithin, the organic is comparable in quality and available in substantial commercial quantities at this time – shipped in pails, buckets, barrels and tankers.

Respectfully submitted,

Lynn Clarkson

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